



DEPARTMENT OF HEALTH & HUMAN SERVICES

PUBLIC HEALTH SERVICE

Food and Drug Administration
Denver District Office
Building 20 - Denver Federal Center
P. O. Box 25087
Denver, Colorado 80225
TELEPHONE: 303-236-3000

March 8, 1999

Mr. Thomas Mower
President
Neways International
150 East 400 North
Salem, UT 84653

Dear Mr. Mower:

We are in receipt of your letter dated February 18, 1999 regarding issues of labeling regulations for dietary supplements.

We are forwarding your letter to the Office of Legislative Affairs for their review and response.

Sincerely,

Shelly L. Maifarth
Shelly L. Maifarth
Compliance Officer

o: HFW-1 (OLA)- for review and response
cc: SLM chrono
DFAB ☒ /EI file
RF

dw.dw.030599

98N-0044

Responed 4/22
CW Maifarth
OCA

Sent to
Dockets

C22306

*To: SLW-PLS recd. I think we should refer this to OLA.
Let me know what you think.*



*REA
7/22/99*

*Do-PS acknowledge
and advise that we have
forwarded
HEW-37 (OLA) for
their response.
SUMApeak
3-5-99*

February 18, 1999

Food & Drug Administration
Building 20 Denver Federal Center
Denver, Colorado 80225-0087

Dear FDA:

Re: FDA's Proposed Labeling Regulations

I am writing as the president of Neways International, a multi-level marketing company that dedicates itself to providing the safest and most efficient beauty and health products that research and technology can generate. We hold this standard throughout the three countries in which we manufacture and the 40+ countries in which we distribute our products.

I take issue at some of the labeling regulations for dietary supplements that you recently proposed:

1. You wish to narrow what can be said about dietary supplements versus what can be said about drugs.
2. You have redefined disease to say that any deviation of the body from a "natural" state would be considered a "disease", thus severely limiting allowable structure/function claims that could be made on dietary supplement labels, the role of the ingredients, and their intended affects on humans.
3. I believe you are compromising the Dietary Supplement Health and Education Act of 1994 (DSHEA), by not allowing consumers to have full access to valuable scientific information.
4. There has been a dirge of media coverage for such an important health concern. Even though the FDA has a responsibility to address the concerns of consumers; and even though the FDA has received tens of thousands of letters from concerned citizens wanting a broad

"Providing NEWAYS to Bridge the Gap Between Science and Human Needs."

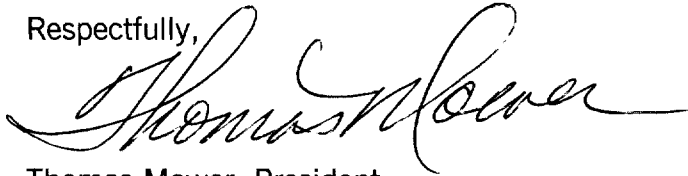
150 East 400 North, P.O. Box 651, Salem, Utah 84653, Tel: (801) 423-2800, Fax: (801) 423-2350

range of information that will affect their health-product choices, the media has been conspicuous by its absence!

I refer, now, to an article written by Joe Grey in a magazine called Texas Business, September 1996, in which a Dr. Bucci is quoted as saying, "Some of the *best* supplements are sold by multi-level marketing companies. The reason is they educate consumers better than anyone." Mr. Grey goes on to say, "Education, of course, is why multi-level marketing is a necessary choice for many companies; their products *can have little impact on the market unless the customer has a clear understanding of what they do and how they operate.*"

Let's not cut-the-public-short by limiting the information they are entitled to when making the most educated healthy life choices.

Respectfully,

A handwritten signature in cursive script, reading "Thomas Mower". The signature is fluid and elegant, with a large, sweeping "T" and a long, horizontal flourish at the end.

Thomas Mower, President
Neways International